

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a) Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)
)
Plaintiff,)
)
v.) **Jury Trial Demanded**
)
FEDERAL INSURANCE COMPANY, an)
Indiana corporation, and ACE)
AMERICAN INSURANCE COMPANY, a)
Pennsylvania corporation,)
)
Defendants.)
)

**NOTICE OF DEPOSITION UNDER
FED.R.CIV.P. 30(b)(6) OF FEDERAL INSURANCE COMPANY
AND ACE AMERICAN INSURANCE COMPANY**

TO: Federal Insurance Company and
Ace American Insurance Company
c/o Terrence J. Fleming
tfleming@fredlaw.com
Leah Janus
ljanus@fredlaw.com
Christopher D. Pham
cpham@fredlaw.com
Christian V. Hokans
chokans@fredlaw.com
Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Fair Isaac Corporation (“FICO”) will take the deposition upon oral examination of Defendant Federal Insurance Company (“Federal”) and ACE American Insurance Company (“Ace American”) by its designated witness or witnesses regarding the topics identified in Attachment A, attached.



The deposition of Defendants' designee(s) will commence on Tuesday, November 26, 2019, at 9:30 a.m., at Merchant & Gould P.C., 150 South Fifth Street, Suite 2200, Minneapolis, MN 55402. The deposition will be taken before and transcribed by a notary public or other officer authorized to administer oaths and record testimony. The testimony will be recorded by stenographic means and may be recorded by videographic means.

Dated: November 18, 2019

MERCHANT & GOULD P.C.

/s/ Allen Hinderaker

Allen Hinderaker, MN Bar # 45787
Heather Kliebenstein, MN Bar # 337419
Michael A. Erbele, MN Bar # 393635
Joseph W. Dubis, MN Bar #398344
MERCHANT & GOULD P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-2215
Tel: (612) 332-5300
Fax: (612) 332-9081
ahinderaker@merchantgould.com
hkliebenstein@merchantgould.com
merbele@merchantgould.com
jdubis@merchantgould.com

Attorneys for Plaintiff FICO

ATTACHMENT A

INSTRUCTIONS

1. You are required to appear at the taking of a deposition to testify responsive to the following topics. You are required to furnish such information as is available to you, including, but not limited to, information known to your officers, employees, agents, or anyone acting for or on your behalf.

2. If you have no information about the subject of a particular category or if for some reason you are unable to answer it, the response should specifically so state.

3. If you assert a claim of privilege in objection to any topic or question, identify the nature and basis of the privilege claimed, and provide as much of the following information as is not encompassed by the privilege: type; general subject matter and purpose; date; the names of persons making or receiving the communication, and of those present when it was made; the relationship of the named person to the author or speaker; and any other information upon which you may rely to support your claim of privilege or the immunity from discovery.

30(b)(6) DEPOSITION TOPICS

1. All installations of all versions of the FICO software at issue in this lawsuit where the installation occurred outside of the United States.

2. The location of each installation provided in response to Topic No. 1.

3. The date of each installation provided in response to Topic No. 1.

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2019, a copy of the foregoing was emailed to the following attorneys of record:

Terrence J. Fleming
tfleming@fredlaw.com
Leah C. Janus
ljanus@fredlaw.com
Christopher D. Pham
cpham@fredlaw.com
Christian V. Hokans
chokans@fredlaw.com
FREDRIKSON & BYRON, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402-1425

Dated: November 18, 2019

s/Kristin M. Drieman
Kristin M. Drieman